

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

DAVID GRENKE, individually, and on behalf of all others similarly situated,  Plaintiff,  v.  HEARST COMMUNICATIONS, INC., a Delaware Corporation,  Defendant.	Case No. 12-cv-14221-GCS-MKM  Hon. George C. Steeh
ROSE COULTER-OWENS, individually, and on behalf of all others similarly situated,  Plaintiff,  v.  TIME INC., a Delaware Corporation,  Defendant.	Case No. 12-cv-14390-GCS-MKM  Hon. George C. Steeh

**JOINT MOTION TO AMEND SCHEDULING ORDER**

Defendants Hearst Communications, Inc. and Time Inc. (collectively “Defendants”), and Plaintiffs David Grenke and Rose Coulter-Owens (collectively “Plaintiffs,” and together with Defendants, the “Parties”), by and through their respective counsel hereby move the Court to extend the deadline for witness lists to be filed from September 8, 2014 to November 21, 2014, and state as follows:

1. After motion practice and a stay of proceedings for the parties to determine whether a settlement of the above-captioned actions (either some or all) was possible, by Order dated May 19,

2014, the Court ordered the above-captioned actions to proceed along a previously-stipulated schedule that set January 9, 2015 as the discovery cutoff date in the actions and September 8, 2014 as the cutoff date for witness lists to be filed. (Grenke Dkt. 52, 54; Coulter-Owens Dkt. 58, 60).

2. Consistent with the current Scheduling Order, on June 23, 2014, Defendant Time Inc. filed its Answer to Plaintiff Rose Coulter-Owens' First Amended Class Action Complaint (Coulter-Owens Dkt. 65) and Defendant Hearst Communications, Inc. filed its Answer to Plaintiff David Grenke's Complaint. (Grenke Dkt. 59). On August 8, 2014, each Defendant served its respective Rule 26(a) disclosures. The Parties are currently engaged in discovery.

3. On August 14, 2014, the Parties conferred and agreed that given the current posture of the actions, the deadline for the filing of witness lists should, subject to Court approval, be extended from September 8, 2014 to November 21, 2014.

4. The Parties' joint request is supported by good cause—extending the witness list filing deadline to November 21, 2014 will enable the Parties to compile their respective witness lists with the benefit of additional discovery.

5. The instant motion is filed in good faith and not for purposes of undue delay or for any improper purpose. To the contrary, the Parties believe that extending the deadline for filing witness lists to November 21, 2014 will be more efficient for, and conserve the resources of, both the Parties and the Court.

WHEREAS, Defendants Hearst Communications, Inc. and Time Inc., and Plaintiffs David Grenke and Rose Coulter-Owens respectfully request that the Court enter an Order amending the current schedule to move the deadline for filing of witness lists to November 21, 2014. The Parties request that relief be granted by text-only order.

**Respectfully submitted,**

Dated: September 5, 2014

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Dated: September 5, 2014

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**CERTIFICATE OF SERVICE**

I, Jeffrey Landis, an attorney, certify that on September 5, 2014, I served the above and foregoing Joint Motion to Amend Scheduling Order by causing true and accurate copies of such paper to be filed and transmitted to all counsel of record via the court's CM/ECF electronic filing system.

/s/ Jeffrey Landis